



February 26, 2013  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: Computer Tel, Inc.  
CPNI Certification  
EB Docket No. 06-36; CY2012**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2012 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Computer Tel, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas

Consultant to Computer Tel, Inc.

cc: Ana Carbajal - Computer Tel  
file: Computer Tel - FCC - Other  
tms: FCx1301

Enclosures  
ST/im

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

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Annual 64.2009(e) CPNI Certification for:	Calendar Year 2012
Name of Company covered by this certification:	Computer Tel, Inc.
Form 499 Filer ID:	825823
Name of Signatory:	Angharad Jassan
Title of Signatory:	Treasurer

I, Angharad Jassan, certify and state that:

1. I am Treasurer of Computer Tel, Inc., and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Attachment A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



\_\_\_\_\_  
Angharad Jassan, Treasurer  
Computer Tel, Inc.

\_\_\_\_\_  
February 21 2013  
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Exhibit A  
Statement of CPNI Procedures and Compliance

**Computer Tel, Inc.**

Calendar Year 2012

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
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Computer Tel, Inc.

Statement of CPNI Procedures and Compliance

Computer Tel, Inc. ("Computer Tel" or "Company") provides wholesale international terminating telecommunications services to other carriers and as such does not have any subscribed service relationship with end user business or residential customers. The Company does not obtain, retain or use CPNI for any purpose. Although the Company has call detail records, it does not have any information regarding the calling or called party, and such information is not used for marketing purposes. The Company is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and each Company has procedures which provide for disciplinary action for such violations, up to and including termination of employment.

Moreover, the Company does not market their services to end users in any fashion. Instead, marketing efforts are directed towards resellers and other carriers who require international termination. Marketing efforts do not include the use of CPNI or call detail records.

The Company does not disclose call record information over the telephone.

The Company does not disclose detail records on-line.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should the Company expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

The Company has procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, each Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2012.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.